

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re:

|                           |   |                       |
|---------------------------|---|-----------------------|
| Jesse & Bethany Sullivan, | ) | Case No. 10-11111 NLJ |
|                           | ) | Chapter 13            |
| Debtors.                  | ) |                       |

**MOTION TO RETAIN TAX REFUND**

COME NOW Jesse & Bethany Sullivan (“Debtors”), through their attorney of record, Patrick E. Moore, and move this honorable court to enter an Order allowing the Debtors to retain their 2010 state and federal tax refunds.

In support of their motion the Debtors would state the following:

1. Mr. Sullivan works on a contract basis. His current contract expires on March 18<sup>th</sup>, 2011. He is not guaranteed employment after this date.
2. Both debtors require dental care, but will be unable to pay for it without retaining the refund.
3. Debtors have received a federal refund in the amount of \$426.00 and a State refund in the amount of \$279.00.

WHEREFORE, for the reasons stated above, Debtors respectfully request that this Court enter an order allowing them to retain their federal and state income tax refunds for 2010.

Respectfully submitted,



Elizabeth Pickens, OBA #21779  
OF THE FIRM: Patrick E. Moore, Inc.  
625 N.W. 13<sup>th</sup> Street  
Oklahoma City, OK 73103  
(405) 606-7016 phone  
(405) 606-7017 fax

**TIME FOR RESPONSE:** Pursuant to Rule 3015(g), Fed.R.Bankr.P., a written response must be served on the above-named attorney within twentyone (21) days from the date of filing of this motion. Failure to respond within the time allowed may cause the pleading to be deemed confessed, and relief may be granted *ex parte* if a proposed order granting the relief is timely submitted to the court.

#### CERTIFICATE OF SERVICE

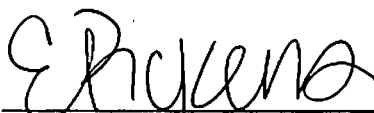
This will certify that a true and correct copy of the foregoing Motion was mailed via USPS first class, postage prepaid on March 1, 2011 to the following:

Jesse & Bethany Sullivan  
11148 SW 5<sup>th</sup> Street  
Yukon, OK 73099

This will certify that a true and correct copy of the foregoing Motion was delivered via the ECF electronic notification system on March 1, 2011 to the following parties:

Chapter 13 Trustee, John Hardeman

Assistant United States Trustee



Elizabeth Pickens